## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF INDIANA

TIFFANY LEWIS, on behalf of herself and others similarly situated,	) Case No.: 1:25-cv-00275-JPH-MJD )
Plaintiff,	)
v.	)
REGISTER.COM, INC.,	)
Defendant.	) )
	J

## DECLARATION OF ANTHONY PARONICH IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Pursuant to 28 U.S.C. § 1746, I declare as follows:

- 1. My name is Anthony Paronich.
- 2. I am over twenty-one years of age.
- 3. I am fully competent to make the statements included in this declaration.
- 4. I have personal knowledge of the statements included in this declaration.
- 5. I am counsel for Tiffany Lewis.
- 6. I am admitted to practice before this Court.
- 7. I submit this declaration in support of Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement.
- 8. I am a 2010 graduate of Suffolk Law School. In 2010, I was admitted to the Bar in Massachusetts. Since then, I have been admitted to practice before the Federal District Court for the District of Massachusetts, the Northern District of Illinois, the Eastern District of Michigan, the Western District of Wisconsin, the Southern District of Indiana, the First Circuit Court of Appeals, the Seventh Circuit Court of Appeals, and the Ninth Circuit Court of Appeals. From time

to time, I have appeared in other State and Federal District Courts *pro hac vice*. I am in good standing in every court to which I am admitted to practice.

- 9. I was an associate at Broderick Law, P.C. in Boston, Massachusetts from 2010 through 2016.
- 10. I was a partner at Broderick & Paronich, P.C. in Boston, Massachusetts from 2016 through 2019.
- 11. In 2019, I started Paronich Law, P.C., focused on protecting consumers in class action lawsuits.
- 12. I have been appointed class counsel in more than 50 TCPA cases, including the following:
  - i. <u>Desai and Charvat v. ADT Security Services, Inc.</u>, USDC, N.D. Ill., 11-CV-1925, a TCPA class settlement of \$15,000,000 granted final approval on June 21, 2013.
  - ii. <u>Jay Clogg Realty Group, Inc. v. Burger King Corporation</u>, USDC, D. Md., 13-cv-00662, a TCPA class settlement of \$8,500,000 granted final approval on April 15, 2015.
  - iii. <u>Charvat v. AEP Energy, Inc.</u>, USDC, N.D. Ill., 1:14-cv-03121, a TCPA class settlement of \$6,000,000 granted final approval on September 28, 2015.
  - iv. <u>Bull v. US Coachways, Inc.</u>, USDC, N.D. Ill., 1:14-cv-05789, a TCPA class settlement finally approved on November 11, 2016 with an agreement for judgment in the amount of \$49,932,375 and an assignment of rights against defendant's insurance carrier.
  - v. <u>Smith v. State Farm Mut. Auto. Ins. Co., et. al., USDC</u>, N.D. Ill., 1:13-cv-02018, a TCPA class settlement of \$7,000,000.00 granted final approval on December 8, 2016.
  - vi. Mey v. Frontier Communications Corporation, USDC, D. Conn., 3:13-cv-1191-MPS, a TCPA class settlement of \$11,000,000 granted final approval on June 2, 2017.
  - vii. <u>Heidarpour v. Central Payment Co.</u>, USDC, M.D. Ga., 15-cv-139, a TCPA class settlement of \$6,500,000 granted final approval on May 4, 2017.
  - viii. Abante Rooter and Plumbing, Inc. v. Birch Communications, Inc., USDC, N.D.

- Ga., 1:15-CV-03562-AT, a TCPA class settlement of \$12,000,000 granted final approval on December 14, 2017.
- ix. <u>Abante Rooter and Plumbing, Inc. v. Pivotal Payments, Inc.,</u> USDC, N.D. Ca., 3:16-cv-05486-JCS, a TCPA class settlement of \$9,000,000 granted final approval on October 15, 2018.
- x. <u>In re Monitronics International, Inc.</u>, USDC, N.D. W.Va., 1:13-md-02493-JPB-JES, a TCPA class settlement of \$28,000,0000 granted final approval on June 12, 2018.
- xi. Thomas Krakauer v. Dish Network, L.L.C., USDC, M.D.N.C., 1:14-CV-333 on September 9, 2015. Following a contested class certification motion, this case went to trial in January of 2017 returning a verdict of \$20,446,400. On May 22, 2017, this amount was trebled by the Court after finding that Dish Network's violations were "willful or knowing", for a revised damages award of \$61,339,200. (Dkt. No. 338). The Fourth Circuit Court of Appeals unanimously affirmed the judgment in May of 2019. Krakauer v. Dish Network, L.L.C., 925 F.3d 643 (4th Cir. 2019). The United States Supreme Court rejected certiorari of this matter in December of 2019. See DISH Network L.L.C. v. Krakauer, 140 S. Ct. 676 (2019).
- xii. <u>Charvat v. Carnival Corporation & PLC, et. al.</u>, USDC, ND. Ill., 1:13-cv-00042, a TCPA class settlement of \$12,500,000 granted final approval in April of 2020.
- xiii. <u>Loftus v. Sunrun, Inc.</u>, USDC, N.D. Ca.., 3:19-cv-1608, a TCPA class settlement of \$5,500,000 granted final approval on May 11, 2021.
- xiv. Andrew Perrong v. Orbit Energy & Power, LLC, USDC, E.D. PA., Civil Action No. No. 2:21-cv-777. A class settlement of \$6,000,000 granted final approval on June 21, 2022.
- xv. <u>David Vance, et. al. v. DirecTV, LLC</u>, USDC, N.D. WV., Civil Action No. 5:17-cv-179. A class settlement of \$16,850,000 granted final approval on August 24, 2023.
- xvi. <u>Berman v. Freedom Financial Network, LLC et al.</u> N.D. CA., Civil Action No. 18-cv-1060. A class action settlement of \$9,750,000 granted final approval on February 23, 2024
- xvii. <u>Murray v. Grocery Delivery E-Services USA, Inc.</u> D. MA. Civil Action No. 19-cv-12608. A class action settlement of \$11,000,000 granted final approval on March 13, 2024.
- xviii. Williams v. Choice Health Insurance LLC, M.D. AL., Civil Action No. 23-cv-292. A class action settlement of \$7,000,000 granted final approval on July 22, 2024

xix. Smith, et. al. v. Assurance IQ, LLC, Civil Action No. 23-ch-09225 (Ill.). A class action settlement of \$21,875,000, granted final approval on September 3, 2024.

## Paronich Law's Willingness and Ability to Protect Absent Class Members

- 13. Paronich Law has, and will continue to, vigorously protect the interests of the settlement class.
- 14. Paronich Law, together with co-counsel, has advanced all costs necessary to litigate this action.
- 15. Paronich Law has devoted a very significant amount of time to this case and will continue to devote all necessary time to it.
  - 16. Paronich Law has no known conflicts with the settlement class.

## **Opinion of Paronich Law**

17. Paronich Law firmly believe that the parties' settlement is fair, reasonable, adequate, and in the best interests of members of the settlement class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 28, 2026

/s/ Anthony Paronich
Anthony Paronich